



OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

*Attorneys at Law*

599 Lexington Avenue, 17th Floor  
New York, New York 10022  
Telephone: 212.492.2500  
Facsimile: 212.492.2501  
www.ogletreedeakins.com

## MEMO ENDORSED


Evan B. Citron  
212.492.2068  
evan.citron@ogletree.com

March 31, 2023

### VIA ECF

The Honorable Edgardo Ramos  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Defendants' request for an extension, until April 14, 2023, to file a stipulation of dismissal is granted.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: March 31, 2023  
New York, New York

Re: *Franco v. LTS Century Building, LLC et al.*, 19-cv-09846 (ER)

Dear Judge Ramos:

We represent Defendants LTS Century Building, LLC, Barnes & Noble, Inc., and Barnes & Noble Booksellers, Inc. (collectively, "Defendants") in the above-referenced matter. In accordance with Rule 1.E of Your Honor's Individual Practices, with Plaintiff's consent, and for the reasons summarized below, we respectfully write to request an extension of the parties' time to file a stipulation of dismissal from March 31, 2023 until April 14, 2023.

Although, as Defendants previously noted, the parties have finalized their Settlement Agreement (the "Agreement"), and Defendants have transmitted the settlement payment pursuant to the terms of the Agreement, Defendants, as between themselves, remain in the process of finalizing other details pertaining to certain non-monetary relief provided for under the Agreement. As Defendants must finalize those outstanding items prior to the filing of the stipulation of dismissal, and Plaintiff's filing of a stipulation of remediation, we respectfully request the relief sought herein, which, in Defendants' view, will afford them sufficient time to do so.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By: s/ Evan B. Citron  
Evan B. Citron

cc: All counsel of record (via ECF)